UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and:

<u>Floyd Little, et al.</u> v. National Football League, et al.

Court File No. 2:12-cv-2219-AB

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR PLAINTIFFS RONALD AND JUDITH ACKS

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed, P.L.L.P. ("Plaintiffs' Counsel"), moves this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Ronald Acks and Judith Acks only in this action, and state as follows:

- 1. Plaintiffs' counsel filed the action *Floyd Little*, *et al. v. National Football League*, *et al.*, No. 2:12-cv-2219-AB, in the Eastern District of Pennsylvania on April 24, 2012, for the benefit of several retired National Football League players, including Ronald Acks and Judith Acks.
- 2. Plaintiffs' counsel filed a short form complaint for Plaintiffs Ronald Acks and Judith Acks on July 16, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiffs Ronald

Acks and Judith Acks and the undersigned.

4. Plaintiffs' counsel properly notified Ronald Acks and Judith Acks of

counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the

Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to

withdraw as counsel for Ronald Acks and Judith Acks only in Court File No. 2:12-cv-

2219-AB.

Dated: June 10, 2015

Respectfully submitted,

ZIMMERMAN REED, P.L.L.P.

s/ Brian C. Gudmundson

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